

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

United States of America
ex rel. ALEX DOE, Relator,

The State of Texas
ex rel. ALEX DOE, Relator,

The State of Louisiana
ex rel. ALEX DOE, Relator,

Plaintiffs,

v.

Planned Parenthood Federation of America,
Inc., Planned Parenthood Gulf Coast, Inc.,
Planned Parenthood of Greater Texas, Inc.,
Planned Parenthood South Texas, Inc.,
Planned Parenthood Cameron County, Inc.,
Planned Parenthood San Antonio, Inc.,

Defendants.

Civil Action No. 2:21-CV-00022-Z

**JOINT STIPULATION RE MODIFIED SCHEDULE FOR EXPERT WITNESS
DISCLOSURES**

WHEREAS, on July 13, 2022, the Court entered an Amended Scheduling Order (Dkt. 123), which sets the following deadlines for the disclosure of expert witnesses and reports under Federal Rule of Civil Procedure 26(a)(2):

Expert Discovery	Deadline
Responsive Expert Designation and Report	September 26, 2022
Rebuttal Expert Designation and Report	October 16, 2022

WHEREAS, Plaintiff State of Texas, Relator Alex Doe, and Defendants Planned Parenthood Federation of America, Inc., Planned Parenthood Gulf Coast, Inc., Planned Parenthood

of Greater Texas, Inc., Planned Parenthood South Texas, Inc., Planned Parenthood Cameron County, Inc., and Planned Parenthood San Antonio, Inc. (each a “Party” and together, the “Parties”) have met and conferred and agreed to a modest, ten-day extension of the deadlines for both Responsive and Rebuttal expert reports;

WHEREAS, the Parties have met and conferred and further agree that these ten-day extensions will not impact any other deadlines reflected in the Amended Scheduling Order.

IT IS HEREBY STIPULATED AND AGREED by the Parties hereto, as of the date hereof, through their undersigned counsel, that the following modified deadlines will apply:

Expert Discovery	New Deadline
Responsive Expert Designation and Report	October 6, 2022
Rebuttal Expert Designation and Report	October 26, 2022

Dated: September 21, 2022

/s/ Heather Hacker

Andrew B. Stephens
Texas Bar No. 24079396
Heather Gebelin Hacker
Texas Bar No. 24103325
HACKER STEPHENS LLP
108 Wild Basin Road South, Suite 250
Austin, Texas 78746
(512) 399-3022
andrew@hackerstephens.com
heather@hackerstephens.com

Attorneys for Relator Alex Doe

KEN PAXTON
Attorney General of Texas
BRENT WEBSTER
First Assistant Attorney General
GRANT DORFMAN
Deputy First Assistant Attorney General
SHAWN E. COWLES
Deputy Attorney General for Civil Litigation

/s/ Raymond Winter

RAYMOND CHARLES WINTER
Chief, Civil Medicaid Fraud Division Texas
Bar No. 21791950

AMY S. HILTON
Assistant Attorney General
General Litigation Division
State Bar No. 24097834

Office of the Attorney General P.O. Box
12548, Capitol Station Austin, Texas 78711-
2548 (512) 463-2120 / Fax (512) 320-0667
Raymond.Winter@oag.texas.gov
Amy.Hilton@oag.texas.gov

Attorneys for Plaintiff State of Texas

/s/ Tirzah Lollar

Craig D. Margolis

Craig.Margolis@arnoldporter.com

Tirzah S. Lollar

Tirzah.Lollar@arnoldporter.com

601 Massachusetts Ave, NW

Washington, DC 20001-3743

Telephone: +1 202.942.6199

Fax: +1 202.942.5999

Christopher M. Odell

Texas State Bar No. 24037205

Christopher.Odell@arnoldporter.com

700 Louisiana Street,

Suite 4000

Houston, TX 77002-2755

Telephone: +1 713.576.2400

Fax: +1 713.576.2499

Ryan Patrick Brown

Texas State Bar. No. 24073967

brown@blackburnbrownlaw.com

Blackburn & Brown, L.L.P.

1222 S. Fillmore

Amarillo, TX 79101

Tel: (806) 371-8333

Fax: (806) 350-7716

*Attorneys for Defendants Planned Parenthood
Gulf Coast, Inc., Planned Parenthood South
Texas, Inc., Planned Parenthood Cameron
County, Inc., Planned Parenthood San Antonio,
Inc., and Planned Parenthood of Greater Texas,
Inc.*

/s/ Danny Ashby

Danny S. Ashby
Texas State Bar No. 01370960
dashby@omm.com
Justin R. Chapa
Texas State Bar No. 24074019
jchapa@omm.com
2501 N. Harwood Street
Suite 1700
Dallas, TX 75201
T: (972) 360-1900
F: (972) 360-1901

Leah Godesky (*pro hac vice*)
lgodesky@omm.com
1999 Avenue of the Stars, 8th Floor
Los Angeles, CA 90067
T: (310) 553-6700
F: (310) 246-6779

*Attorneys for Defendant Planned Parenthood
Federation of America, Inc.*